

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NAUTILUS INSURANCE COMPANY,)
)
Plaintiff,)
)
v.)
)
RICHARD ALEXANDER MURDAUGH,)
)
Sr., CORY FLEMING, MOSS & KUHN,)
)
P.A., CHAD WESTENDORF, and)
)
PALMETTO STATE BANK,)
)
Defendants.)

Case No. 2:22-cv-1307-RMG

**NAUTILUS INSURANCE
COMPANY'S RULE 26(a)(3)
PRETRIAL DISCLOSURES**

Nautilus Insurance Company ("Nautilus"), by and through its undersigned attorneys, hereby submits the following disclosures pursuant to Fed. R. Civ. P. 26(a)(3):

1. The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises.

In addition to Defendants and those witnesses identified by Defendants, and without waiving the right to call additional witnesses, Nautilus expects to present the following witnesses at trial:

1. Amy Coryer Miller, c/o undersigned counsel

Ms. Miller was the Nautilus claims adjuster for the insurance claim made by Defendant Murdaugh relating to the death of Gloria Satterfield.

2. Representative of Nautilus, c/o undersigned counsel

Nautilus expects to call a representative of Nautilus to testify about the insurance claim made by Defendant Murdaugh relating to the death of Gloria Satterfield.

3. Chad Westendorf

Mr. Westendorf served as the personal representative for the Estate of Gloria Satterfield in relation to the wrongful death claim advanced by Defendants.

4. John Grantland

Mr. Grantland was defense counsel hired by Nautilus to defend Defendant Murdaugh in

relation to the wrongful death claim advanced by Defendants.

Nautilus does not waive or limit its right to object to the presentation of any witness on grounds of competency, relevance, materiality, privilege, confidentiality, admissibility, or any other ground. Trident further reserves the right to call additional witnesses not identified in these disclosures as may be necessary, including for purposes of impeachment.

2. The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony.

Nautilus intends to offer its witnesses live at trial, barring unforeseen circumstances preventing the same. In that event, Nautilus reserves the right to provide designations for that witness or those witnesses. Nautilus further reserves the right to provide counter-designations to any designations made by Defendants.

3. An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

Nautilus attaches a list of expected exhibits to these responses. Nautilus does not waive or limit its right to offer additional exhibits or to object to any exhibit, proposed here by it or elsewhere by any Defendant, on grounds of authenticity, competency, relevancy, materiality, privilege, confidentiality, admissibility as evidence for any purpose, or any other ground. Nautilus may offer as exhibits portions or enlargements of any exhibits identified in these disclosures. Nautilus further reserves the right to introduce into evidence any documents produced by either party for review during discovery, documents included as exhibits to any deposition or attached as exhibits to memoranda of law filed in this action, correspondence between the parties or their counsel, any pleadings, affidavits, or documents either filed or served in this action, and any exhibit listed by any Defendant.

Nautilus may also introduce into evidence illustrative demonstrative exhibits. Nautilus reserves the right to use additional exhibits not identified in these disclosures based on any developments that may occur during the course of the trial that were not anticipated and reserves the right to counter-designate exhibits, for completeness purposes or otherwise, based upon Defendants' pretrial designations. Nautilus reserves the right to offer as evidence additional documents as needed for cross-examination, impeachment, or rebuttal.

Respectfully submitted:

EPTING & RANNIK, LLC

This 2nd day of December, 2024
Charleston, South Carolina

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*ATTORNEYS FOR NAUTILUS INSURANCE
COMPANY*